

KSC/MS: USAO#2014R00313

OCT 28 2014

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ABDUL JAMEL SMITH,
aka Duge,
RORY SLADE JENKINS,
aka Malik,

ALTONIA SYLVESTER HENDERSON,
ERIC CHRISTOPHER SMALLWOOD,
aka Big Baby,
aka E,

Defendants.

UNDER SEAL

CRIMINAL NO. WDQ-14-0503
* (Conspiracy to Distribute and
* Possess with Intent to Distribute
* Controlled Substances, 21 U.S.C. §
* 846)

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

From at least in or about May 2014, and continuing to in or about October 2014, in the
District of Maryland and elsewhere,

ABDUL JAMEL SMITH,
aka Duge,
RORY SLADE JENKINS,
aka Malik,

the defendants herein, did knowingly, willfully, and unlawfully combine; conspire, confederate,
and agree with each other and with others known and unknown to the Grand Jury to knowingly,
intentionally, and unlawfully distribute and possess with intent to distribute 100 grams or more

of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

21 U.S.C. § 846

COUNT TWO

The Grand Jury for the District of Maryland charges that:

From at least in or about May 2014, and continuing to in or about October 2014, in the District of Maryland and elsewhere,

**ABDUL JAMEL SMITH,
aka Duge,
RORY SLADE JENKINS,
aka Malik,
ALTONIA SYLVESTER HENDERSON,
ERIC CHRISTOPHER SMALLWOOD,
aka Big Baby,
aka E,**

the defendants herein, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

21 U.S.C. § 846

COUNT THREE

The Grand Jury for the District of Maryland charges that:

From at least in or about May 2014, and continuing to in or about October 2014, in the District of Maryland and elsewhere,

**ABDUL JAMEL SMITH,
aka Duge,
ALTONIA SYLVESTER HENDERSON,
ERIC CHRISTOPHER SMALLWOOD,
aka Big Baby,
aka E,**

the defendants herein, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

21 U.S.C. § 846

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Title 18, United States Code, Section 853, upon conviction of an offense in violation of 18 U.S.C. § 846 or § 841(a) as set forth in Counts One, Two, and Three, each defendant shall forfeit to the United States of America:
 - a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
 - b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.
2. If any of the property described above, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

18 U.S.C. § 853; 28 U.S.C. § 2461(c); Rule 32.2(a)

Rod Rosenstein /ksc
ROD J. ROSENSTEIN
United States Attorney

A TRUE BILL:

[REDACTED]
Foreperson

10-23-14
Date: